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March 22, 2023

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BY ECF

Hon. Sarah L. Cave
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Dorce, et al. v. City of New York, et al.*, No. 1:19-cv-02216 (JLR) (SLC)

Dear Judge Cave:

Plaintiffs, Municipal Defendants,¹ and Transferee Defendants² respectfully write to clarify the deadline for the parties' next joint letter reporting on the status of document discovery. The parties' March 9, 2023 joint status letter (ECF No. 243) proposed a filing deadline of two weeks—which from the Court's Order (ECF No. 244) would be Friday, March 24, 2023—consistent with the parties' past practice. The Court's Order states that the parties should file the next joint letter by "Friday, **April** 24, 2023," which is a Monday. Based on the context, the parties believe the Court may have intended to set the deadline for Friday, **March** 24. Given the potential ambiguity, the parties jointly propose that the next status update be due Wednesday, March 29.

¹ "Municipal Defendants" refers to defendants the City of New York (the "City"), Louise Carroll, former Commissioner of the City's Department of Housing Preservation and Development ("HPD"), and Sherif Soliman, former Commissioner of the City's Department of Finance ("DOF").

² "Transferee Defendants" are BSDC Kings Covenant Housing Development Fund Company, Inc. ("BSDC") and Neighborhood Restore Housing Development Fund Corp. ("Neighborhood Restore").

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Respectfully submitted,

PLAINTIFFS

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cc: Counsel of Record (via ECF)